

EXHIBIT Q

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF DENNIS J. VALENTIN

I, Dennis J. Valentin, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today.

Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present at Marriott World Trade when the terrorist attacks on the World Trade Center Towers occurred.

4. On September 11, 2001, I had arrived for my shift as Banquet Houseman around at 6:00 a.m. When the first plane hit, I felt the building rumble, but I did not know what was going on. I continued to work and then a large glass window in the room I was working in shattered and I began feeling heat. I looked outside and saw burning fuselage from the plane in the courtyard. Everyone panicked and I took the escalator down to the main lobby. It was total chaos and I

slipped and fell on the escalator and was trampled in the hordes of people. Initially, first responders told us to stay in the lobby for approximately 15 or 20 minutes. After that, first responders directed that we leave the hotel through the Tall Ships Bar. We followed the first responders through the bar onto Vesey Street. The first responders told us to not look up or look sideways, but to look straight ahead. I did look and saw people getting hit with burning fuselage, and body parts, and parts of the building falling to the ground. I went numb. I had started running to Battery Park when the second plane hit. I looked back and then noticed that everyone had blood on them. As the Marriott workers were one big family, I ran back to the hotel with a group of people to look for our co-workers and then felt the ground shake and crack. As I started to run back to Battery Park, the first tower collapsed. I then saw that I had cuts and bruises all over my body from my head to my legs. Shortly thereafter, the second tower collapsed and I was surrounded by the resulting huge clouds of debris and could not breathe. I ran to the Bowling Green subway station and as I started to run down the steps, I still could not breathe. I then walked to the Brooklyn Bride, but it was closed and I could not cross it. After that, I walked to 67th Street and Second Avenue to my daughter's school. My daughter and I then walked to the 59th Street Bridge. As I was covered in black soot and was all cut up and bruised, a first responder told me that he would take me to the hospital, but I asked that he take me to my home in Queens first so that I could get me daughter home. After I dropped off my daughter, I went to the emergency room.

5. I was in New York City at Ground Zero when the planes hit the towers and I received injuries in the escape and collapse. In the course of the attack and my escape, I witnessed atrocities beyond the imagination of the average citizen. The situation could only be compared to a war zone. I was going about my everyday life in a peaceful manner when we were brutally attacked by terrorists and my life was altered forever.

6. As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: cuts and bruises all over my body; 4 protruding disks in my lower back; my right foot and 3 toes were broken; both rotator cuffs were torn; and my collar bone on the left side was cracked. I also suffer from post-traumatic stress disorder ("PTSD") and vertigo. As a result of the injuries I received on September 11, 2001, I became disabled and could no longer work.

7. I sought medical attention for my injuries. Attached as Exhibit B to this Declaration is a true and correct copy of my medical records related to the treatment that I received following the September 11, 2001 terrorist attacks. I have had to have 5 surgeries for these injuries, which required six screws put into my back, as well as an implanted stimulus machine to help me walk, although I still have difficulty walking.

9. I suffered, and continue to suffer, severe emotional distress as a result of the above terrorist attacks and had to see a psychiatrist for several years as a result. I suffered and continue to suffer from anxiety and bouts of depression due to the traumatic events of these terrorist attacks.

10. I previously pursued a claim through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation. My VCF Claim Number is VCF212-002353.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 8 day of January 2020.



Signature of Declarant Dennis J. Valentin

Exhibits Filed Under Seal